

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA
2018 MAR 30 PM 3:07
OFFICE OF THE CLERK

United State District Court Nebraska

Valentine

Garcia #2132

Lang #2134

Omaha Police Officers

Case# 8:18CV142

We Seeking \$100,000,000.00 damages
for the ^{excessive} force perpetrated
on us by defendant's upon plaintiff
on February 2-29-2016 with bogus
Search Warrant as is set out in
8:16CV131 / 8:16CV174 / 8:18CV00069 in
Support:

1) On March 2-29-2016 the police had been

1.)

Omaha Nebraska

Called to 1915 Emmet ~~because~~ because my boyfriend had assault his friend in a imbroglio/brouhaha with his friend while they both was drunk. 2) Officer Garcia #2132 and Lang #2134 knocked on the door I open up the door and told them that Anthony wasn't here but I let them in to look around to see if he was there. 3) Officers Garcia #2132 and Lang #2134 then left. 4) Thirty minutes later I then get another knock on the door it was Officer Lang #2134 and Officer Garcia #2132, so I opened up the door it was cracked half way opened I was talking to them so I said whats up. 5) Officers Lang #2134 and Garcia #2132 said they needed to talk to me so I said hold on I need to go upstairs so I can ^{get} some shoes on

6) As I was shutting the door to go grab my shoes, Officer Garcia^{#2132} and Lang^{#2134} pushed the door open as I was shutting it and forced their way into 1915 Emmet and said I was going to jail. I then asked them repeatedly why was I going to jail. ~~Officer~~ Officer Lang^{#2134} and Garcia^{#2132} then tried to make me put my hand behind my back I refused to put my hands behind my back because I kept repeatedly asking them why then I was tased and ~~I then~~ ^{then I was placed in hand} cuffs then ^{they} told me I had ~~I~~ a warrant for controlled substance. 7) When they tased me I was tased on my right ^{bottom} arm bruised and it was bleeding all because Garcia^{#2132} and Lang^{#2134} wouldn't tell me why I had ~~a~~ ⁹¹ warrant

I was booked on 2-29-2016, stayed in jail for three days then I was released. I got out on bond ^{signature} for about 12 months, had to call in, ~~and~~ for about 12 months a week before trial my case got dropped for Controlled Substance. When I went to jail for resistance Arrest it was then dropped as well. But Lang and Garica forced their way into the house at 1915 Emmet on 2-29-16 to arrest me for the Warrant for my arrest for the controlled substance that day without my consent. The second time they knocked on the door.

For my controlled substance case
 I think it was a part of a
 Conspiracy because they tried to
 give me three plea bargains and I
 turned them all down. All of the
 Officers was willing to lie to
 get a conviction out of me, three
 of them already lied and said I
 consented to a strip search in
~~the~~ a ~~residence~~ bathroom at 1915 Emmet
 Officers Lisa, Jennifer, Chris, ¹⁸⁷³ 7-17-15
 Officer Garica ^{#2132} was in the house
 when it was raided on 7-17-15 and
 then when I was tased for resisting
 arrest 2-29-16

5.)

When the house at 1915 Emmet got
 raided Officers Lisa Jennifer Chris ^{#1873}
 Garcia ^{#2132} George ^{#1486} David ^{#1263} Sharon ^{#S051} Christine ^{#S551}
 Anita ^{#S575} Alexander ^{S576} were all willing
 to lie if I took the plea bargain that
 I obstruct Government Operations
 if I plead guilty to it. ^{I never took the}
^{plea bargain but my case} ~~my case~~
 I went away for controlled substance
 12 months later, but I sued Lisa
 and Jennifer lost in federal court.
 All the Officers are all trying to
 sweep this case up under the rug that
 said that Officers get out of crime
 because they have a badge. This
 system in Omaha Nebraska is so screwed
 up where is the justice?

6.)

I Veronica Valentine rights have clearly been violated but the justice system in Omaha Nebraska clearly sits back and just watch because I'm an ^{female} nigger Black African American. The Justice system in Omaha Nebraska ~~has~~ ^{has} been corrupted in Omaha Nebraska every since that I was born and its been this way for years and years. All 12 Officers are all white and its just one of me so the system would believe 12 Officer before they believe one of me. These Officers are all lying and they need lie ~~do~~ ^{either} test in Omaha to see who's telling the truth.

Because clearly Omaha Police lie to cover themselves and will stick together when they are on the hot seat. My Controlled Substance case went away 12 months later but I had went through some horrible stuff to prove my innocence. Getting charges brought against me 7 months later after the first time they came to the house, put on culling in every day because of the arrest, strip search, being tased, resisting arrest charges, forced to take off my clothes in a bathroom, Their Attorney talking bad about me in court still saying that I'm a drug dealer even know my charges got dropped.

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It's documented Bout 5 ten years ago in
the Omaha World Herald that Omaha
Police Officers was planting
drugs on black African American
People in North side Omaha Nebraska.
Officer Chris Brown has been racial
profiling me every since the crime stopper
tip, his Attorney Timothy Hine said it
in Court February 20, 2018. I Veronica
Valentine testified on the stand submitted
the case as it is on the record and
Judge Smith Camp told me if that's what
I wanted I said yes got off the stand
(4.)

I Veronica Valentine walked back to the table and gather my paper work and started exiting for the door. When out of nowhere Jennifer Hansen and Lisa Villwok Attorney start yelling out that I'm a drug dealer and that Officer Chris Brown has been investigating me for months. I left the court room because it was hard for me since 7-17-15 so I didn't want to stay through the whole trial. Because I already knew the Officers was lying in the depositions so why stay for them to be on the stand to hear more lies. Judge Camp Smith did nothing to stop Timothy Himes from talking crazy to me and believes I gave my consent and now Judge Camp Smith is now saying that I abandoned my case since I left the court room.

10.)

Judge Camp^{Smith} refuses to give me a copy of my transcript of the trial for free, I knew i didn't have a chance in Omaha Nebraska but I did it because my rights have clearly been violated ~~And~~ I'm not about to let the Omaha Police Department ~~get~~ get away with what they did to me or any one else rights. It's a lot that went on in my case and the justice system needs to open up their eyes and do something about it. I have rights and I am not a slave.

- 3-30-18

Veronica Valentine
642 Jaynes St
Omaha, NE 68104

11j

All of these Case are all tied together
 8:16cv131 / 174 the resisting Arrest
 Case All the police Officer keep
 say that I'm a drug dealer but my
 Case got drop. Officer Chris Brown
 said that A "CI" brought drugs
 from me July 14 and 16 of 2015
 So I have the right to know
 who this CI is. I been strip
 Search without my consent, tased,
 went to jail since I a drug
 dealer so they say why wasn't I
~~Charged~~ charged with a Controlled substance
 then. Where was the Omaha Polices
 Cams in my case. If they had the
 body Cams in my cases 8:16cv131
 / 174 my problems would be solved
 if they where them on 7-17-2015. "12 Officers"
 against one I never stood a chance.

*I had a warrant
for when they came in on
July 17, 15*

1 of 1 100% Find | Next



Report Generated:
6/17/2016 4:32:49 PM

OMAHA POLICE DEPARTMENT
PUBLIC BOOKING ARREST REPORT

RB#
AH58977

☐ FELONY ☒ MISDEMEANOR ☐ WARRANT ONLY

*The warrant was
issued January 1, 16*

OCCURRED					REPORTED				
Location Occurred 1915 Emmet St Omaha, Douglas County				District # 38	Location Reported				District #
Day of Week	Month (MM)	Day (DD)	Year (YY)	Hour:Minute	Day of Week	Month (MM)	Day (DD)	Year (YY)	Hour:Minute
Monday	02	29	2016	09:06					
Monday	02	29	2016	09:06					
ARRESTED	Day of Week Monday	Month (MM) 02	Day (DD) 29	Year (YY) 2016	Hour:Minute 09:06	Location 1915 Emmet St Omaha, Douglas County			District 38
O	OFFENDER NAME <input type="checkbox"/> ID VERIFIED VALENTINE, VERONICA				DOB (MM/DD/YY) 7/9/1974	AGE 42	DATA# - Data Center Use Only 1241852		
F	ALIAS				ALIAS DOB				
F	ADDRESS 1915 Emmet St				CITY OMAHA	STATE NE	ZIP 68110		
E	DRIVERS LICENSE#/STATE H12058595 / Nebraska				RESIDENCE PHONE		OTHER PHONE		
N	RACE [F] B	SEX [G] F	HEIGHT 5 FT 0 IN	WEIGH T 160	HAIR BLK	EYES BRO	SCARS-MARKS-TATTOOS		
D	<input type="checkbox"/> DV RELATED				<input checked="" type="checkbox"/> US CITIZEN		METHOD OF IDENTIFICATION DRIVER LICENSE		
E	PLATE#/STATE/YEAR				VIN				
R	COLOR	YEAR	MAKE	MODEL	STYLE	OTHER			
CHARGE 1 RESISTING ARREST					WARRANT #	STATUTE/ORDINANC E 28-904(3)(A)	Conversion Code 20914	RB# if different	
CHARGE 2 WARRANT					WARRANT # 3745441	STATUTE/ORDINANC E	Conversion Code	RB# if different	
BOOKING #		COURT		<input type="checkbox"/> SCHOOL ZONE <input type="checkbox"/> CONSTRUCTION ZONE			WEAPON CODE [E]		
ON SCENE <input type="checkbox"/> CIB <input type="checkbox"/> CRIME LAB CIB ADVISED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO					ADVISED OFFICER/SER#		ON SCENE INVESTIGATOR/SER #		
OTHER REPORTS									
<p>Narrative</p> <p>On MON 29FEB16 at 0647 hours, R/O's LANG #2134 and GARCIA #2132 responded to an assault call at Florence and Lothrop reference RB#AH58968. During the investigation, R/O's were able to locate the home residence of the assault suspect at 1915 Emmet. R/O's attempted to make contact with the suspect at the address, but made contact with a B/F instead. The B/F was uncooperative with the investigation. R/O's were able to identify the B/F by running her vehicle's plate and getting a first name from the assault victim. The B/F was identified as VALENTINE, Veronica (7-9-74). R/O's made contact with the VALENTINE again at 1915 Emmet. R/O's informed VALENTINE she was under arrest for a felony warrant and to place her hands behind her back. R/O's had a scuffle with VALENTINE after she refused to follow commands and actively tried to pull away from the officers, retreating to a couch in the corner of the residence. After VALENTINE continue to attempt to push R/O's away from her, she was tasered by R/O LANG #2134 and taken into custody. VALENTINE was booked for resisting arrest and a felony warrant. Medic 21 on scene. Forensics Investigations took photographs of laser probes. Sgt KISTER 1143 on scene.</p> <p>See SUPP and Chiefs report for details.</p>									
<p>CONDITIONS</p> <p>Road Surface Visibility Other Traffic Present</p> <p>Roadway Highway Type Traffic Flow</p>									
COMMAND Authorizing Booking / SERIAL # KISTER, Troy / 1143					TRANSPORTED BY / SERIAL # GARCIA, STEPHEN / 2132				
SEARCHED BY / SERIAL # GARCIA, STEPHEN / 2132					ASSISTING OFFICER / SERIAL #				
REPORTING OFFICER / SERIAL # GARCIA, STEPHEN / 2132					IF JUVENILE - LIST INTAKE OFFICER APPROVING BOOKING				

Public Booking Report

PAGE 1 OF 1

Report P0140061

Justice # ZK1100044
Data # 1241852

2

IN THE DISTRICT COURT OF DOUGLAS COUNTY, NEBRASKA

STATE OF NEBRASKA

Plaintiff,

CR16 0000928

vs.

VERONICA J VALENTINE,

Defendant.

a.k.a.: VERONICA J VALENTINE

a.k.a.: VERONICA J VALENTINE

a.k.a.: VERONICA L VALENTINE

a.k.a.: VERONICA VALENTINE

a.k.a.: VERONICA VALENTINE

D.O.B. 9 July 1974.

ADDRESS: 6112 JAYNES ST
OMAHA, NE 68104

DR. LIC.: H12058595 NE

AR# K1100044

RB# H05508

CMS# K1100044 Z

xx

**AMENDED
INFORMATION**

The State of Nebraska hereby informs the Court that VERONICA J VALENTINE is alleged to have violated the laws of the State of Nebraska, to-wit:

COUNT 1: OBSTRUCT GOVERNMENTAL OPERATIONS

On or about 17 July 2015, in Douglas County, Nebraska, VERONICA J VALENTINE within Douglas County, Nebraska contrary to the Statutes of the State of Nebraska and against the peace and dignity of the State did intentionally obstruct, impair, or pervert the administration of law or other governmental functions by force, violence, physical interference or obstacle, breach of official duty or any other unlawful act. (Penalty: 28-901 Class I Misdemeanor)

I, SEAN M. LAVERY, DEP. COUNTY ATTORNEY, allege that this Information is true based upon my information and belief.

SEAN M. LAVERY, # 24283
DEP. COUNTY ATTORNEY

Witnesses for the State:

SHANON TYSOR #S051
CHRISTINE GABIG #S551
ANITA W WONG #S575
ALEXANDER J MICHALAK #S576

* Jennifer

* Lisa Villwolk

same house
* (STEPHEN K GARCIA #2132) he was involved in my resisting Arrest
* CHRISTOPHER D BROWN #1873
* GEORGE E COLLINS #1486
* DAVID L BIANCHI #1263

Justice # CW160008

IN THE COUNTY COURT OF DOUGLAS COUNTY, NEBRASKA
FELONY COMPLAINT

STATE OF NEBRASKA

Plaintiff,

vs.

VERONICA J VALENTINE,

Defendant.

a.k.a.: VERONICA J VALENTINE

a.k.a.: VERONICA J VALENTINE

a.k.a.: VERONICA L VALENTINE

a.k.a.: VERONICA VALENTINE

D.O.B. 9 July 1974.

ADDRESS: 6112 JAYNES ST
OMAHA, NE 68104

DR. LIC.: H12058595 NE

AR# CW160008

RB# H05508

CMS# CW160008

LR

CR#

16 342

CRIMINAL COMPLAINT

On the complaint and information of SEAN LAVERY, County Attorney/Deputy County Attorney of Douglas County, Nebraska, made in the name of the State of Nebraska before the undersigned Clerk of the County Court within and for said County of Douglas, State of Nebraska, on 5 January 2016, who being sworn on oath says, that the above named Defendant, contrary to the form of the statutes in such cases made and provided and against the peace and dignity of the State of Nebraska, violated the laws of the State, to-wit:

COUNT 1: POSSESSION OF A CONTROLLED SUBSTANCE Class IV Felony

On or about 17 July 2015, in Douglas County, Nebraska, VERONICA J VALENTINE did then and there knowingly or intentionally possess a controlled substance to wit: BASE COCAINE (CRACK), in violation of Neb. Rev. Stat. §28-416(3), a Class IV Felony.
21966
28-416(3)

contrary to the statutes of the State of Nebraska.

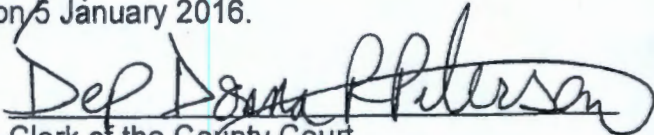


0050241CRC01



SEAN LAVERY, # 24283
County Attorney/Deputy County Attorney

Subscribed and sworn to in my presence on 5 January 2016.



Clerk of the County Court
Douglas County, Nebraska

Witnesses for the State:



CHRISTOPHER D BROWN #1873

SEAN LAVERY
COUNTY ATTORNEY
DOUGLAS COUNTY, NEBRASKA

JAN 30 9-10318

03714

We move for dismissal based on "complete failure of proof" in that

1. Statute Mandate Requires "MEASURABLE amount" whereas at Bar there is "immeasurable amount" and upon at Bar is for "PARAPHERALIA" misdemeanor



City of Omaha
Jean Stothert, Mayor

August 8, 2017



Todd R. Schmaderer
Chief of Police

Omaha Police Department
"To Serve and Protect"
305 South 15th Street
Omaha, Nebraska 68102-2769
(402) 444-5600
fax (402) 444-5898
www.opd.cityofomaha.org

Officer Jennifer Hansen
3111 Gold Rush Road
Council Bluffs, IA 51501

Officer Hansen:

I received an Internal Information Report expressing concerns about your sick leave usage, its proper documentation and required doctor's notes being submitted to your supervisor. Based on the Internal Information Report, I authorized an internal investigation into your sick leave documentation. The Internal Affairs Unit has completed its investigation and the findings are detailed in this letter.

On May 2, 2017 you were scheduled to attend in-service training. You attended the training but you advised the training staff that you could not perform certain portions of the physical exercises, specifically the newly mandated carotid restraint control hold (CRCH), due to a neck injury you received from an on duty vehicular accident in 2012. The CRCH is a required defensive tactic that all full duty officers must be trained on. You were instructed by the staff to obtain a doctor's note excusing your participation from the CRCH training. This doctor's note stated you were to "avoid hand to hand combat drills, limit overhead lifting over 20lbs" and "occasional out of body reaching more than 12 inches". Therefore you were not required to participate in the CRCH training. This note essentially placed you on limited duty status since the restrictions limited your ability to perform many of the requirements of your job as a full duty police officer. You then completed the second day of in-service training on May 3 with no complaints or issues regarding your pre-existing injury. Policy requires that if you unable to perform all the duties of your position that you are to notify the Chief through the chain of command so that a decision may be made on how to accommodate you. You failed to follow this policy.

After the second day of training, you then notified your sergeant about an alleged injury you received while at the in-service training on May 2 and stated you needed to be marked "sick leave" for remainder of your work week (May 4-5) due to the alleged injury. You advised your sergeant you would have a doctor's note when you returned to work on May 8. When you presented the note from your doctor, the note, which was dated May 4, stated you were excused from work on May 3 (an incorrect date since you worked this date at the in-service). Your sergeant noticed this mistake and told you to get a doctor's note with the correct date (May 2). Your sergeant stated it was common for you to turn in doctor's notes with incorrect dates listed and these notes would often be turned in weeks after you utilized sick leave.

On May 10, you notified your sergeant that you needed to be placed on limited duty status through May 11 due to your alleged injury and that you would again provide a doctor's note. Again, this

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CITY DEFS 0783

2017-0177

J. Hansen

limited duty work was not authorized or approved in accordance with policy. Your sergeant advised you that this doctor's note also needed to release you to full duty status since you were assigned weekend investigator duty and could be called out to crime scenes. Your sergeant stated this note needed to be turned into him by May 11 because he was leaving town. At the end of that work day, you had not received this note and your sergeant told you to turn it into your lieutenant by Friday, May 12, so you would be cleared for weekend duty. Your sergeant reported the note was never turned into him or the lieutenant.

During your Internal Affairs interview, you stated you personally retrieved the note on May 11 from your doctor's office and then placed it on your sergeant's desk. You stated that you could not remember if you were told by your sergeant to turn the note into your lieutenant. You then explained it somehow was moved from your sergeant's desk, to your mail tray in your sergeant's office, where you alleged it sat for "two months". Your sergeant stated that he never observed this note in the mail tray during this time frame. He stated he frequently places paperwork in your mail tray, which is often empty, and would have noticed a doctor's note. An email showed you scanned and emailed this doctor's note to the Police Services Bureau sergeant, who assists with injuries which occur on duty, on May 31, 2017. You disobeyed a direct, lawful order from a commanding officer to have a doctor's turned into a command officer by a specific date and time.

A command audit was conducted on your sick leave usage. Since the beginning of 2017, it was discovered you have taken the twenty four (24) full or partial days of sick leave, four (4) days of family sick leave and five (5) days of injured on duty (IOD) status. Additional research showed you had not been filling out the required sick leave forms (OPD Form 131) to document days in which you took sick leave or IOD leave. During your Internal Affairs interview, you stated you were not clear on the sick leave policy regarding when a Form 131 needed to be completed. You have since properly filled out all the outstanding Form 131s to match your sick leave usage for the year. You admitted you would not contact a doctor immediately when you took sick days and that you were the person who decided if you were going to be limited duty status, based on how you felt, and not a doctor. This is in violation of policy and goes against what you were told to do by the Police Services Bureau sergeant who manages your workers compensation injury claim.

Regarding the allegation that you violated the Omaha Police Policy and Procedures Manual regarding Leave Procedures – Sick Leave Policy – Sworn Personnel, Medical Services – Examination/Treatment, and Disobedience of Orders, the investigation found evidence to support the allegations; therefore, the allegations are all sustained.

You are therefore found to be in violation of the following:

Omaha Police Policy and Procedures Manual, Personnel Section, "Leave Procedures – Sick Leave Policy – Sworn Personnel",

Omaha Police Policy and Procedures Manual, Personnel Section, "Medical Services – Examination/Treatment", and,

Omaha Police Policy and Procedures Manual, Rules of Conduct, Chapter 1 – Section 2, "Disobedience of Orders".

2017-0177

J. Hansen

Collective Bargaining Agreement between the Omaha Police Officers' Association and the City of Omaha, Article 6, Discharge and Discipline Section 1, Disciplinary Action-Cause: Any action which reflects discredit upon the service or is a direct hindrance to the effective performance of the CITY government functions shall be considered good cause for disciplinary action and,

Collective Bargaining Agreement between the Omaha Police Officers' Association and the City of Omaha, Article 6, Section 1 "(j) Commission of acts or omissions unbecoming an incumbent of the particular office or position held, which render his admonishment, reprimand, suspension, demotion, or discharge necessary or desirable for the economical or efficient conduct of the CITY or for the best interest of the CITY government."

You are to be suspended without pay for a period of three (3) working days. This suspension without pay will be held in abeyance pending your decision to appeal this discipline. The procedure for filing an appeal is contained in the Omaha Police Officers' Association contract. If you choose not to appeal this decision, you must immediately make arrangements with your Captain to serve this suspension by October 6, 2017. You must also notify Police Human Resources of the date(s) the suspension is going to be served.

Sincerely,



Todd R. Schmaderer
Chief of Police

TRS/kaw

cc: Mr. Tim Young, Director, City Human Resources
Mr. Bernard in den Bosch, Deputy City Attorney Law Department
Ms. Claire E. Anderson, Personnel Records Custodian, City Human Resources
Deputy Chief Mary Newman
Acting Captain Kenneth Kanger
Omaha Police Officers' Association-Office
Mr. Kyle Porter, Police Personnel Supervisor
2017-0177

ACKNOWLEDGMENT OF RECEIPT

I, Ofc. Jennifer Hansen, hereby acknowledge receipt of this item
of correspondence from the City of Omaha, Omaha Police Department, presented
to me this 9th day of August, 2017, regarding
discipline letter

Employee:

Jen Hansen 1585

Supervisor:

Det. [Signature] 1413

cc: City Human Resources Director
City Labor Relations Director
Police Human Resources
II or CC # 2017- 0177

Sign and Return to Internal Affairs

acknowledgpt

CITY DEFS.0786

47

IN THE DISTRICT COURT OF DOUGLAS COUNTY, NEBRASKA.

THE STATE OF NEBRASKA,

Plaintiff,

VS.

VERONICA J. VALENTINE,

Defendant.

CR 16-928

ORDER OF DISMISSAL

THIS MATTER is before the Court on the oral motion of Sean Lavery, Deputy Douglas County Attorney, for an order dismissing without prejudice the Information filed in the above-captioned matter. The Court, being fully advised in the premises, finds that the State's Motion to Dismiss should be sustained.

IT IS THEREFORE ORDERED that the State's oral motion to dismiss without prejudice the Information filed in the above-captioned matter shall be, and hereby is, sustained.

SO ORDERED.

DATED this 30 day of Nov 2016.

BY THE COURT:

Hon. Horacio J. Wheelock
Douglas County District Court Judge

C: Sean Lavery
Jacquelyn Morrison

